



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

May 1, 2019

Michael.sin@lacity.org

Michael Sin, City Planning Associate
City of Los Angeles, City Planning Department
200 N. Spring Street, Room 621
Los Angeles, CA 90012

Sustainable Communities Environmental Assessment (SCEA) for the Proposed Olympic and Hill Project (ENV-2019-1792-SCEA)

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final SCEA.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish existing parking structure and build a 657,943-square-foot mixed-use building with 700 residential units, 15,000 square feet of commercial uses, and subterranean parking on 1.16 acres (Proposed Project). Based on a review of aerial photographs, South Coast AQMD staff found that multi-family residences are located within approximately 100 feet across South Hill Street. Construction of the Proposed Project is assumed to take approximately 30 months to complete with buildout in 2022¹.

South Coast AQMD Staff's Comments

In the Air Quality Section, the Lead Agency found that the Proposed Project's construction activities would result in less than significant regional and localized air quality impacts. However, regional NO_x emissions and localized particulate matter (PM) emissions were found to be slightly below South Coast AQMD's respective air quality CEQA significance thresholds. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. To further reduce the Proposed Project's regional NO_x emissions and localized PM emissions during construction, particularly in the grading/excavation phase, and potential impacts on the multi-family residences located within 100 feet of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency review and incorporate the following mitigation measures in the Final SCEA. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website².

Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters

Use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions³. A list of CARB verified DPFs are available on the CARB website⁴.

¹ SCEA. Page VI-9.

² South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

³ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

⁴ *Ibid*. Page 18.

Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Moreover, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Enforceability

To ensure that Tier 4 construction equipment will be used during the construction phase of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency include the requirement as a mitigation measure or a project design feature for the Proposed Project in the Final SCEA.

South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition of existing buildings, asbestos may be encountered during demolition. As such, South Coast AQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with South Coast AQMD Rule 1403⁵ in the Air Quality Section of the Final SCEA.

Closing

Please provide the South Coast AQMD with written responses to all comments contained herein prior to the certification of the Final SCEA. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. South Coast AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190405-03

Control Number

⁵ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rulebook/reg-xiv/rule-1403.pdf>.